

1 Your Name:

Louise Vaughn

2 Address:

4800 3rd St SF

3 Phone Number:

(415) 970-1065

4 Fax Number:

5 E-mail Address:

6 Pro Se Plaintiff

8 United States District Court

9 Northern District of California

11 Louise Vaughn

13 Plaintiff(s),

14 vs.

15 Sotheby's International Realty

19 Defendant(s).

Case Number: CV 15 5649

COMPLAINT

DEMAND FOR JURY TRIAL

Yes ☐ No ☐

21 1. Parties in this Complaint

22 a. Plaintiff(s). Write your name, address, and phone number. If there are other
23 plaintiffs, use more pages to include their names, addresses, and phone numbers.

24 Name: Louise Vaughn

25 Address: 4800 Third St. #202

26 San Francisco, CA 94124

27 Phone number: (415) 970-1065

COMPLAINT

PAGE 1 OF 6 [JDC TEMPLATE]

FILED

2015 DEC 10 P 3:09

SUSAN Y. SOONG
CLERK, US DISTRICT COURT
NO. DIST. OF CA.

EDL

b. **Defendant(s).** Write the full name and address of every defendant. If the defendant is a corporation, write the state where it is incorporated and the state where it has its main place of business. Use more pages if you need to.

Defendant 1:Name: Sotheby's International RealtyAddress: 117 Greenwich St,San Francisco, CA 94111**Defendant 2:**

Name: _____

Address: _____

Defendant 3:

Name: _____

Address: _____

Defendant 4:

Name: _____

Address: _____

2. Jurisdiction

Usually, only two types of cases can be filed in federal court: cases involving "federal questions" and cases involving "diversity of citizenship." Check at least one box.

☒ My case belongs in federal court under federal question jurisdiction because it is about federal law(s) or right(s).

Which law(s) or right(s) are involved? Fair Housing Act, Title VIII
of the Civil Rights Act of 1968 (42 U.S.C. 3601)

☐ My case belongs in federal court under diversity jurisdiction because none of the plaintiffs live in the same state as any of the defendants AND the amount of damages is more than \$75,000.

COMPLAINT

PAGE 2 OF 6 [JDC TEMPLATE]

1 **3. Venue**

2 *This Court can hear cases arising out of Alameda, Contra Costa, Del Norte, Humboldt,*
 3 *Lake, Marin, Mendocino, Monterey, Napa, San Benito, Santa Clara, Santa Cruz, San Francisco,*
 4 *San Mateo, and Sonoma counties. This is the right court to file your lawsuit if 1) All defendants*
 5 *live in California AND at least one of the defendants lives in this district; OR 2) A substantial*
 6 *part of the events you are suing about happened in this district; OR 3) A substantial part of the*
 7 *property that you are suing about is located in this district; OR 4) You are suing the U.S.*
 8 *government or a federal agency or official in their official capacities and you live in this district.*
 9 *Explain why this district court is the proper location to file your lawsuit.*

10 Venue is appropriate in this Court because

11 The incident occurred
 12 in San Francisco

13 **4. Intradistrict Assignment**

14 *There are three divisions of this Court: San Francisco/Oakland, San Jose, and Eureka.*
 15 *The San Francisco/Oakland division covers Alameda, Contra Costa, Marin, Napa, San*
 16 *Francisco, San Mateo, and Sonoma counties. The San Jose division covers Monterey, San*
 17 *Benito, Santa Clara, Santa Cruz counties. The Eureka division covers Del Norte, Humboldt,*
 18 *Lake, Mendocino counties, only if all parties consent to a magistrate judge. Explain which*
 19 *division your case should be assigned.*

20 This lawsuit should be assigned to [Select one: (San Francisco/Oakland, San Jose, OR
 21 Eureka)] Division of this Court because

22 SAN FRANCISCO

23
 24 **5. Statement of Facts and Claims**

25 *Write a short and simple description of the facts of your case. Include WHERE and*
 26 *WHEN the events happened, WHO was involved, WHAT role each defendant played, and HOW*
 27 *you were harmed. If you know which laws or rights the defendant violated, you can include them,*
 28 *but you do not need to make legal arguments. Put each fact or claim into a separate, numbered*

paragraph, starting with 5a, 5b, and so on. Attach additional sheets of paper as necessary. You may attach documents that support your claims to the end of this Complaint as exhibits. Explain what each exhibit is, when and how you got it, and how it supports your claims. Attaching a document to your Complaint does not necessarily mean that it will be accepted as evidence.

5A. As A protected Class African American and Christian, between the the opening of the housing site at 4800 Third Street San Francisco. I was denied the opportunity along with my daughter (Teresa Warren) to submit an application, By Linda Harrison I viewed the site on a Sunday after Church when the open House was opened to the public, at the time it was unoccupied I believe it was sometime in 2010 or 2011. I call a few days after viewing them. Linda Harrison was the person I ~~spoke~~ spoke with. I told her I would love to have a unit there to be near my Church on Oakdale Ave, and that I was a senior ^{citizen} and would like to know how to qualify? She (Miss Harrison) said "I would have to make \$96,000 ^{per yr} to qualify, which meant I could not qualify in my mind.

5B, Linda Harrison's, false information was an outrageous error that caused my family greatly, harm and almost achieved her goal of preventing us from being a part of the community, A community where before the Civil Rights act. of 1968 was the only area African ^{Americans} could freely rent or purchase into. Because of the overt effort of Redlining by Realty Company & Banks

COMPLAINT

PAGE 4 OF 6 [JDC TEMPLATE]

1 So. The Hurt and pain caused by such mean and cruel
 2 rejection is inconceivable when there was no doubt
 3 in my mind after all that's changed for so many
 4 discrimination has become the main focus on African American
 5 to achieve the gentrification in areas where we once
 6 could have a small economy. And the hurt and pain is
 7 more severe when people who benefited by the blood-
 8 shed of so many before us are many times heads
 9 that effort. I continued to search for affordable housing
 10 year after year because of what she (Linda Harrison
 11 had done to us. But for some reason I called
 12 (Linda Harrison) again. She told me again "I needed to
 13 make \$96,000 per yr. to qualify"
 14 But my youngest daughter (Terri) had come from an
 15 appointment and heard the conversation we were having
 16 (Miss Harrison & myself) she (Terri) said "I can't believe
 17 anyone making \$96,000 a year would want to live there."
 18 I called again and finally spoke with (Michael Simmons)
 19 He said my daughter and I could qualify with about
 20 \$30,000 and he would get us in" he was nice and
 21 respectful and connected me with the right ^{person} to get
 22 our application started. I talked with him on
 23 December 18th or so 2014. At that time there were only
 24 about 3 units left out of the 18 originals and no
 25 parking space were available. I was not allowed to
 26 apply earlier because of Linda Harrison an agent
 27 of Sotheby's International Realty.
 28

6. Demand for Relief

State what you want the Court to do for you. For example, depending on which claims you raise, it may be appropriate to ask the Court to award you money or order the defendant to do something or stop doing something. If you are asking for money, you can say how much you are asking for and why you should get that amount.

My family and myself should be compensated for ~~for~~ punitive damages from Sotheby's International Realty because (Linda Harrison) was there agent and somehow they overlooked her action, that caused great pain and suffering. The stress of representing myself in this action is a hardship who was only looking for a place to live near my church, and was deceived for almost 4 years. (2) a parking space and 1st in line for me or a family member if any unit vacates.

7. Demand for Jury Trial

Check this box if you want your case to be decided by a jury, instead of a judge.

☒ Plaintiff demands a jury trial on all issues.

All plaintiffs must sign, date, and print their names at the end of the Complaint. Attach another page if you need to.

Respectfully submitted,

Date: 12/10/2015 Sign Name:

Print Name:

Louise Vaughn
Louise Vaughn

COMPLAINT

PAGE 6 OF 6 [JDC TEMPLATE]